

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

-----)	Chapter 11
In re)	
TELEGLOBE COMMUNICATIONS)	Jointly Administered
CORPORATION, <i>et al.</i> ,)	Bankr. Case No. 02-11518 (MFW)
)	
Debtors.)	
-----)	
TELEGLOBE COMMUNICATIONS)	
CORPORATION, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 04-CV-1266 (SLR)
)	
BCE INC., <i>et al.</i> ,)	
)	
Defendants.)	
-----)	

OPPOSITION TO DEFENDANTS' MOTION FOR A STAY PENDING APPEAL

For all the reasons set forth on the record during the conference call with the Court on June 6, 2006, Plaintiffs oppose Defendants' Motion to Stay the Court's Order of June 2, 2006.¹

¹ Given the Court's admonition that Plaintiffs need not file a responsive brief, we will not do so, except to note that Defendants' attack on the Special Master for not replying to the Affidavit of Stephen Gillers (p. 3) is entirely unfair, given that the Affidavit was filed *after* the Special Master submitted his final report.

A handwritten signature in black ink, appearing to read 'Gregory V. Varallo', is written over a horizontal line.

Gregory V. Varallo (No. 2242)

varallo@rlf.com

RICHARDS, LAYTON & FINGER, P.A.

One Rodney Square

P.O. Box 551

Wilmington, Delaware 19899

Telephone: (302) 651-7700

ATTORNEYS FOR TELEGLOBE COMM.
CORP., *et al.*

Dated: June 6, 2006

CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2006, I hand delivered and electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will send notification of such filing(s) to the following:

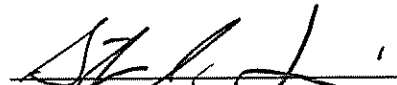
Pauline K. Morgan, Esquire
YOUNG CONAWAY STARGATT &
TAYLOR, LLP
The Brandywine Building
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, DE 19899

Joseph A. Rosenthal , Esquire
ROSENTHAL, MONHAIT, GROSS
& GODDESS, P.A.
1401 Mellon Bank Center
P.O. Box 1070
Wilmington, DE 19801

I hereby certify that on June 6, 2006, I have sent by electronic mail the foregoing document to the following non-registered participants:

John Amato, Esquire
Hahn & Hessen LLP
488 Madison Avenue
New York, NY 10022

Jaculin Aaron, Esquire
Paula Howell, Esquire
SHEARMAN & STERLING LLP
599 Lexington Avenue
New York, NY 10022


Steven J. Fineman (# 4025)
fineman@rlf.com
Richards, Layton & Finger, P.A.
One Rodney Square
P.O. Box 551
Wilmington, Delaware 19899
(302) 651-7700